

Exhibit 10

(REDACTED)

This Exhibit contains the specific pages of the deposition Plaintiffs are referencing. The entire deposition was separately filed in the record pursuant to LR 5.1 and the M.D. Ga. CM/ECF Administrative Procedures Manual.

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION

WILHEN HILL BARRIENTOS,)
ET AL.,)
)
Plaintiffs,)
) CIVIL ACTION FILE
vs.)
) NO: 4:18-CV-00070-CDL
CORECIVIC, INC.,)
)
Defendant.)

DEPOSITION OF JULIETTE DREW

ATLANTA, GEORGIA

FRIDAY, DECEMBER 3, 2021

(Reported Remotely)

REPORTED BY: TANYA L. VERHOVEN-PAGE,
CCR-B-1790

JOB NO: 202788

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December 3, 2021

9:02 a.m.

Deposition of

JULIETTE DREW, held in Atlanta,
Georgia before Tanya L. Verhoven-Page,
Certified Court Reporter and Notary Public
of the State of Georgia.

APPEARANCES OF COUNSEL

On behalf of the Plaintiffs:

SOUTHERN POVERTY LAW CENTER
400 Washington Avenue
Montgomery, AL 36104
BY: CAITLIN SANDLEY, ESQ.
BY: MEREDITH STEWART, ESQ.
BY: JACQUELINE ARANDA OSORNO, ESQ.
(Via Zoom)

On behalf of the Defendant:

STRUCK LOVE BOJANOWSKI & ACEDO
3100 West Ray Road
Chandler, AZ 85226
BY: JACOB LEE, ESQ.
(Via Zoom)

- - -

1 J. DREW

2 A What difference does that make,
3 Ms. Sandley?

4 Q Ma'am, you need to leave the objections
5 to your attorney.

6 MR. LEE: Just answer the
7 questions, please. This is just some
8 background information, and then we'll
9 get into the questions about the lawsuit.

10 BY MS. SANDLEY:

11 Q Ms. Drew, what's your current job title?

12 A Clerk for the tax office.

13 Q And you worked for CoreCivic previously,
14 correct?

15 A Yes.

16 Q And counsel for CoreCivic is representing
17 you today for this deposition, right?

18 A Yes.

19 Q You worked at Stewart Detention Center?

20 A Yes.

21 Q Did you work at any other CoreCivic
22 facilities?

23 A No.

24 Q When did you first start working at
25 Stewart?

1 J. DREW

2 A August the 14th, 2006.

3 Q And was that right around the time that
4 Stewart opened?

5 A Yes.

6 Q And when did you leave Stewart?

7 A December the 16th, 2021 -- '20.

8 Q What was your job title at Stewart?

9 A At which period?

10 Q Well, let's start at the beginning.

11 Can you walk me through the different job
12 titles that you had at Stewart?

13 A I was a records clerk, classification
14 officer, and then classification coordinator,
15 supervisor.

16 Q Okay. When did you become the
17 classification coordinator, supervisor?

18 A Somewhere around 2009 or '10 or --
19 somewhere around in there.

20 Q Okay. What were your job
21 responsibilities as classification supervisor?

22 A Supervising two classification officers,
23 supervising two records clerks, sending out reports,
24 doing my monthly reports, policy updates, making sure
25 that the detainees were in the right uniform

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J. DREW

[REDACTED]

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J. DREW

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[REDACTED]

1 J. DREW

2 Q Was Ms. Norman on the committee?

3 A Oh, yes.

4 Q And how often did the committee meet?

5 A I don't remember that.

6 Q Was it about once a month?

7 A Probably, yes.

8 Q Did anyone keep notes when you all met?

9 A I don't remember. I think so, but I'm
10 not 100 percent positive.

11 Q And, Ms. Drew, were you responsible for
12 developing the -- or let me withdraw that.

13 Were you responsible for updating the
14 policies relating to the work program?

15 MR. LEE: Object to form.

16 THE WITNESS: What?

17 BY MS. SANDLEY:

18 Q Ms. Drew, you referenced policy 18 -- 18
19 earlier; is that right?

20 A Yes, that was the classification.

21 Q Okay. And that policy also includes some
22 information about the work program, right?

23 A Uh-huh.

24 Q And were you responsible for updating
25 that policy?

1 J. DREW

2 A If -- yes, if there were any major
3 decisions that needed to be revised, but I couldn't
4 update it. I would have to do it, and then it passed
5 on up to FSC.

6 Q Okay. So did it have to go to the warden
7 for approval?

8 A Yes.

9 Q And then it had to go to FSC for
10 approval?

11 A Yes.

12 Q And there's an attachment to that policy.
13 It's a chart with a job -- the work program jobs and
14 their pay.

15 Do you recall that chart?

16 A Yes.

17 Q Were you responsible for updating that,
18 too?

19 A Yes.

20 Q And did that have to go to the warden for
21 approval?

22 A Yes.

23 Q Did it have to go to FSC for approval?

24 A Yes.

25 Q Okay. When you were -- when changes were

D I S C L O S U R E

STATE OF GEORGIA) DEPOSITION OF:

FULTON COUNTY) JULIETTE DREW

Pursuant to Article 8.B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia, I make the following disclosure:

I am a Georgia Certified Court Reporter. I am here as a representative of TSG Reporting.

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Tanya L. Verhoven-Page,
Certified Court Reporter,
B-1790.

C E R T I F I C A T E

STATE OF GEORGIA:

FULTON COUNTY:

I hereby certify that the foregoing deposition was reported, as stated in the caption, and the questions and answers thereto were reduced to written page under my direction, that the preceding pages represent a true and correct transcript of the evidence given by said witness.

I further certify that I am not of kin or counsel to the parties in the case, am not in the regular employ of counsel for any of said parties, nor am I in any way financially interested in the result of said case.

Dated this 16th day of December,
2021.



Tanya L. Verhoven-Page,
Certified Court Reporter,
B-1790.